

January 30, 2015

Ms. Rachel Doft, Assistant Attorney General Office of the Attorney General of the State of New York 120 Broadway 25<sup>th</sup> Floor New York, NY 10271

Dear Rachel:

Pursuant to paragraph 27 of the New York Attorney General's Public Pension Fund Reform Code of Conduct, I have enclosed our Annual Compliance Certificate.

Very truly yours,

Encl.:

## **Annual Compliance Certificate**

Pursuant to paragraph 27 of the New York Attorney General's Public Pension Fund Reform Code of Conduct (the "Code of Conduct"), Freeman Spogi & Co. (together with its affiliates, "Freeman Spogli") hereby certifies to the Office of the Attorney General of the State of New York that, to the best of its knowledge after due inquiry, Freeman Spogli has, from January 1, 2014 to the date hereof, complied with the terms of the Code of Conduct with respect to all Public Pension Funds (as defined in the Code of Conduct).

Freeman Spogli & Co.

By:

Name: William M. Wardlaw

Title: Partner

Dated: January 30, 2015